

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT CLEVELAND

**IN RE: NATIONAL PRESCRIPTION,  
OPIATE LITIGATION**

**MDL NO. 2804**

**Case No. 17-MD-2804**

**Judge Dan Aaron Polster**

**THIS DOCUMENT RELATES TO:**

<i>Rees v. McKesson Corporation, et al.</i> MDL Case #1:18-OP-45252	<i>Gibson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45515	<i>Gauthier v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45478
<i>Wood v. Purdue Pharma L.P., et al.</i> MDL Case #1:18-OP-45264	<i>Goldman v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45516	<i>Simonson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45479
<i>Salmons v. Purdue Pharma L.P., et al.</i> MDL Case #1:18-OP-45268;	<i>Rodriquez v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45463	<i>Delancey v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45480
<i>Ambrosio v. Purdue Pharma L.P., et al.</i> MDL Case #1:18-OP-45375	<i>Ellis v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45464	<i>Stewart v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45481
<i>Flanagan v. Purdue Pharma L.P., et al.</i> MDL Case #1:18-OP-45405	<i>DeMaro v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45465	<i>Shewmake v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45482
<i>Whitley v. Purdue Pharma LP., et al.</i> MDL Case #1:18-OP-45598	<i>Cruz v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45466	<i>Weatherwax v. Purdue Pharma, LP., et al.</i> MDL Case No. #1:19-op-45483
<i>Roach v. McKesson Corporation, et al.</i> MDL Case No. #1:18-OP-45662	<i>Paul v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45467	<i>Martinez v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45484
<i>Hunt v. Purdue Pharma L.P., et al.</i> MDL Case No. #1:18-OP-45681	<i>Lechuga v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45468	<i>Williams, v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45485
<i>Moore v. Purdue Pharma L.P., et al.</i> MDL Case No. #1:18-op-46305	<i>Brumbarger v. Purdue Pharma, LP., et al.</i> MDL Case No. #1:19-op-45469	<i>Warren v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45486
<i>Doyle v. Purdue Pharma L.P., et al.</i> MDL Case No. #1:18-op-46327	<i>Means v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45470	<i>Carlson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45487
<i>W.E. v. Purdue Pharma, L.P., et al.,</i> MDL Case No. #1:18-op-46357	<i>Peterson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45472	<i>Flach v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45488
<i>Shaffer, et al. v. Purdue Pharma L.P., et al.,</i> MDL Case No. #18-op-46302	<i>Hampel v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45473	<i>Ivie v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45489
<i>Hanlon v. Purdue Pharma L.P., et al.</i> MDL Case No. #1:19-op-45052	<i>Whittaker v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45475	<i>Cherry v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45490

<i>Artz v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45459	<i>Tuttle v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45476	<i>Patterson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45534
<i>Gilson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45461	<i>Hamawi v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45477	<i>Perkins v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45535
<i>Ortiz v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45492	<i>Goss v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45518	<i>Shepard v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45536
<i>Meinecke v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45493	<i>Herring v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45519	<i>Underwood v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45537
<i>Brant v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45494	<i>Howell v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45520	<i>Richardson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45538
<i>Alexander v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45502	<i>Johnson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45521	<i>Puckett v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45539
<i>Berzinski v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45503	<i>Kommer v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45522	<i>VonCannon v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45540
<i>Johnson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45504	<i>Lively v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45523	<i>Whittington v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45541
<i>Hutchins v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45505	<i>Lyle v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45524	<i>Thomas v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45542
<i>Collier v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45506	<i>Massey v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45525	<i>Wright v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45543
<i>Muffley v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45507	<i>McAnany v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45526	<i>Scully v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45544
<i>Martin v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45508	<i>Shockley v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45527	<i>Watson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45545
<i>Kirk v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45509	<i>Taylor v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45528	
<i>Martin v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45510	<i>Taylor v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45529	
<i>Dixon v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45511	<i>Tindall v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45530	
<i>Gauthier v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45514	<i>Atkinson v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45531	
	<i>Goforth v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45532	
	<i>Chancey v. Purdue Pharma, L.P., et al.</i> MDL Case No. #1:19-op-45533	

**NOTICE OF CORRECTION TO EXHIBIT**

Undersigned counsel for Plaintiffs respectfully submits this notice to correct an error in an exhibit to a previously filed motion that was denied. On July 25, 2019, Plaintiffs filed a motion for leave to file a motion to appoint John Weston and Thomas E. Bilek as NAS Baby Lead Counsel, Marc E. Dann, Esq. as NAS Baby Liaison Counsel and a memorandum in support.<sup>1</sup> This motion was denied. Nonetheless, undersigned counsel was notified of an error in Exhibit 5 concerning a date in the professional employment history of undersigned counsel. Specifically, the Smith Stag law firm was formed in 2002 and undersigned counsel was not a partner of Smith Stag in 1996. Although this motion was denied and the matter is moot, counsel submits this correction to the record out of an abundance of caution and due to the notification received.

Dated: January 2, 2020

Respectfully Submitted,

/s/ Michael G. Stag

Michael G. Stag (LA No. 23314)  
Ashley M. Liuzza (LA No. 34645)  
STAG LIUZZA, LLC  
One Canal Place  
365 Canal Street, Suite 2850  
New Orleans, LA 70130  
Phone: 504-593-9600  
mstag@stagliuzza.com  
aliuzza@stagliuzza.com

---

<sup>1</sup> See Case: 1:17-md-02804 DAP, R. Doc. 1998 Exhibit 5.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was filed via the Court's electronic filing system CM/ECF on this 2<sup>nd</sup> day of January, 2020. Notice of this filing shall be sent via the Court's CM/ECF email notification system to all counsel of record.

/s/ Michael G. Stag  
Michael G. Stag